

# Exhibit A

## Affidavit of Elloree Ganes

*Ashley Reeves, as Personal Representative of the Estate of Carl Albert Reeves v. Town of Cottageville, the Town of Cottageville Police Department and Randall Price, individually*

CA #: 2:12-cv-02765-DCN

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

Ashley Reeves, as Personal  
Representative of the Estate of Carl  
Albert Reeves,

Plaintiff,

v.

Town of Cottageville, the Town of  
Cottageville Police Department and  
Randall Price, Individually,

Defendants.

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C/A #: 2:12-cv-02765-DCN

**AFFIDAVIT OF ELLOREE A. GANES**

PERSONALLY APPEARED BEFORE ME, ELLOREE ANN GANES, who being first  
duly sworn, deposes and states:

1. I am a practicing attorney based in Charleston, South Carolina and am a partner at the Hood Law Firm, LLC.
2. I have been a member of the South Carolina Bar since 2002 and have actively practiced law in Charleston for over 10 years. I am also admitted in the United States District Court for the District of South Carolina.
3. I received my Bachelors degree from Charleston Southern University in 1999 and my J.D. from the University of South Carolina School of Law in 2002. I practice extensively in Charleston County and am a member of the Charleston County Bar Association, among other associations. I am AV rated by Martindale-Hubbell. I believe I am qualified, experienced and

competent to testify as to the reasonable hourly rate for civil rights litigation in the Charleston area.

3. My areas of practice include, but are not necessarily limited to, civil litigation, nursing home negligence cases, police and governmental claims, including civil rights and 42 U.S.C §1983 claims, medical malpractice and insurance law.

4. I have been asked to articulate the reasonable prevailing hourly rates for Plaintiff's practice in 42 U.S.C. §1983 litigation.

4. I am familiar with the legal standards regarding the determination for a reasonable rate for attorney's fees. Under Fourth Circuit law the factors include; (1) the time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney's opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney's expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorney fees awarded in similar cases. *Barber v. Kimbrell's, Inc.*, 577 F.2d 216, 226 (4th Cir.1978).

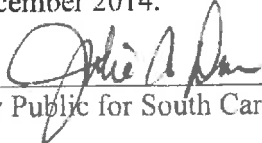
5. I have handled many civil rights cases in federal court brought pursuant to §1983. I am also aware of attorneys' fee awards made by the courts in civil rights cases.

6. Based on my knowledge and experience, I believe that the average or usual rate for attorney's fees of these lawyers fall within the \$150.00 - \$250.00 dollar/hour range.

FURTHER, AFFIANT SAYETH NOT.

  
Ellore A. Ganes

SWORN to before me this 5<sup>th</sup> day  
of December 2014.

  
Notary Public for South Carolina

My Commission expires: 10-20-20